

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

In re

Boy Scouts of America and Delaware BSA, LLC,
Debtors.

Chapter 11

Bankruptcy Case No. 20-10343 (LSS)

(Jointly Administered)

National Union Fire Insurance Co. of Pittsburgh,
PA, *et al.*,

Appellants.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01237-RGA

Travelers Casualty and Surety Company, Inc. *et al.*,
Appellants.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01238-RGA

Old Republic Insurance Company,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01239-RGA

General Star Indemnity Company,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01240-RGA

Indian Harbor Insurance Company,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01241-RGA

Munich Reinsurance America, Inc.,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01242-RGA

Arch Insurance Company,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01243-RGA

Great American Assurance Company *et al.*,

Appellants.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01244-RGA

The Continental Insurance Co., *et al.*,

Appellees.

v.

Case No. 22-cv-01245-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Gemini Insurance Company,

Appellant.

v.

Case No. 22-cv-01246-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Traders and Pacific Insurance Company *et al.*,

Appellants.

v.

Case No. 22-cv-01247-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

D & V Claimants,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01249-RGA

Argonaut Insurance Company *et al.*,

Appellants.

v.

Case No. 22-cv-01250-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Arrowood Indemnity Company,

Appellant.

v.

Case No. 22-cv-01251-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Liberty Mutual Insurance Company *et al.*,

Appellants.

v.

Case No. 22-cv-01252-RGA

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

The Lujan Claimants,

Appellant.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01258-RGA

Allianz Global Risks US Insurance Company *et al.*,

Appellants.

v.

Boy Scouts of America and Delaware BSA, LLC,

Appellees.

Case No. 22-cv-01263-RGA

**STATEMENT PURSUANT TO LOCAL RULE 7.1.1 REGARDING
D & V CLAIMANTS' MOTION FOR LEAVE
TO FILE EXHIBITS IDENTIFIED IN THEIR APPENDIX UNDER SEAL**

I, Charles J. Brown, III, Esq., counsel to D & V Claimants, in the above-referenced action, do hereby certify that a reasonable effort has been made to reach agreement with counsel for Boy Scouts of America and Delaware BSA, LLC (collectively “Appellees”) regarding the relief set forth in *D & V Claimants’ Motion for Leave to File Exhibits Identified in Their Appendix Under Seal* [D.I. 54].

The Parties agreed that Abuse Proofs of Claim need to be filed under seal in their entirety and in redacted form in public. D & V Claimants seek the Court’s permission to do so. The parties agreed that three of the Joint Trial Exhibits at issue do not have to be filed under seal. Appellees did not agree to waive their Confidential designation of the final, fourth Joint Trial Exhibit, so D & V Claimants need the Court’s permission to file this document under seal.

Dated: November 14, 2022

GELLERT SCALI BUSENKELL & BROWN LLC

/s/ Charles J. Brown, III

Charles J. Brown, III, Esquire (No. 3368)
1201 N. Orange St., 3rd Floor
Wilmington, DE 19801
Phone: (302) 425-5813
Email: cbrown@gsbblaw.com

- and -

DUMAS & VAUGHN, LLC

/s/ Gilion C. Dumas

Dumas & Vaughn, LLC., *admitted pro hac vice*
3835 NE Hancock Street, Suite GLB
Portland, OR 97212
Telephone: (503) 616-5007
Email: gilion@dumasandvaughn.com